UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

42WEST LLC,

: cc

Plaintiff,

v.

NOTICE OF MOTION TO SEAL

No. 1:21-cv-01581-OTW

ALEXANDER S. GOULD a/k/a ALEX GOULD

Defendant.

PLEASE TAKE NOTICE THAT, upon the accompanying letter brief, and all other pleadings and proceedings in this action, Plaintiff 42West LLC, by and through their counsel Calcagni & Kanefsky LLP, will move before this Court on November 4, 2024, or as soon thereafter as counsel may be heard, before the Honorable Ona T. Wang, U.S.M.J., United States District Court for the Southern District of New York, 500 Pearl Street, Courtroom 20D, New York, New York 10007, pursuant to Federal Rule of Civil Procedure 5.2, for an Order granting Plaintiff's Motion to Partially Seal the Court's Opinion and Order Entering Default Judgment, docketed at ECF No. 136, and such other and further relief that the Court deems proper.

Dated: October 9, 2024

Respectfully submitted,

CALCAGNI & KANEFSKY, LLP By: /s/ Lauren M. Paxton Lauren M. Paxton, Esq. One Newark Center 1085 Raymond Blvd., 14th Floor Newark, New Jersey 07102 T: (862) 397-1796 F: (862) 902-5458 lpaxton@ck-litigation.com Counsel for Plaintiff 42West LLC